1	Craig A. Newby, Esq. (NSBN 8591) Lisa Wiltshire Alstead, Esq. (NSBN 10470)	
2	MCDONALD CARANO LLP 2300 West Sahara Avenue, Suite 1200	
3	Las Vegas, NV 89102	
4	Telephone: (702) 873-4100 Facsimile: (702) 873-9966	
5	cnewby@mcdonaldcarano.com lalstead@mcdonaldcarano.com	
6	Michael C. Fee, Esq. (BBO No. 552796) (admitt	ted <i>pro hac vice)</i>
7	Dennis M. Lindgren, Esq. (BBO No. 648007) (a PIERCE & MANDELL, P.C.	dmitted pro hac vice)
8	Beacon Street, Suite 800 Boston, MA 02108	
9	Telephone: (617) 720-2444	
10	Facsimile: (617) 720-3693	
	mfee@piercemandell.com dennis@piercemandell.com	
11		
12	Attorneys for Irving A. Backman, Irving A. Backman Associates, LLC and G&B Energy,	
13	Inc.	
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15	UNITED STATES I	DISTRICT COURT
IJ	DISTRICT OF NEVADA	
16	DISTRICT (OF NEVADA
16 17	IRVING A. BACKMAN, an individual; IRVING A. BACKMAN & ASSOCIATES,	OF NEVADA Case No: 2:16-cv-0
	IRVING A. BACKMAN, an individual; IRVING A. BACKMAN & ASSOCIATES, LLC, a Massachusetts limited liability	
17 18	IRVING A. BACKMAN, an individual; IRVING A. BACKMAN & ASSOCIATES,	Case No: 2:16-cv-0
17 18 19	IRVING A. BACKMAN, an individual; IRVING A. BACKMAN & ASSOCIATES, LLC, a Massachusetts limited liability company; and G&B ENERGY, INC., a	Case No: 2:16-cv-0 STIPULATION CONTINUE JOIN
17 18	IRVING A. BACKMAN, an individual; IRVING A. BACKMAN & ASSOCIATES, LLC, a Massachusetts limited liability company; and G&B ENERGY, INC., a Massachusetts corporation.	Case No: 2:16-cv-0
17 18 19	IRVING A. BACKMAN, an individual; IRVING A. BACKMAN & ASSOCIATES, LLC, a Massachusetts limited liability company; and G&B ENERGY, INC., a Massachusetts corporation. Plaintiff, vs.	Case No: 2:16-cv-0 STIPULATION CONTINUE JOIN DEADLINE DEA
17 18 19 20 21	IRVING A. BACKMAN, an individual; IRVING A. BACKMAN & ASSOCIATES, LLC, a Massachusetts limited liability company; and G&B ENERGY, INC., a Massachusetts corporation. Plaintiff,	Case No: 2:16-cv-0 STIPULATION CONTINUE JOIN DEADLINE
17 18 19 20 21	IRVING A. BACKMAN, an individual; IRVING A. BACKMAN & ASSOCIATES, LLC, a Massachusetts limited liability company; and G&B ENERGY, INC., a Massachusetts corporation. Plaintiff, vs. CHRISTOPHER M. GOGGIN, an individual; and C2 ENGINEERING SERVICES, INC., a	Case No: 2:16-cv-0 STIPULATION CONTINUE JOIN DEADLINE DEA
117 118 119 220 221 222 223	IRVING A. BACKMAN, an individual; IRVING A. BACKMAN & ASSOCIATES, LLC, a Massachusetts limited liability company; and G&B ENERGY, INC., a Massachusetts corporation. Plaintiff, vs. CHRISTOPHER M. GOGGIN, an individual; and C2 ENGINEERING SERVICES, INC., a North Carolina corporation.	Case No: 2:16-cv-0 STIPULATION CONTINUE JOIN DEADLINE DEA
17 18 19 20 21 22 23 24 25	IRVING A. BACKMAN, an individual; IRVING A. BACKMAN & ASSOCIATES, LLC, a Massachusetts limited liability company; and G&B ENERGY, INC., a Massachusetts corporation. Plaintiff, vs. CHRISTOPHER M. GOGGIN, an individual; and C2 ENGINEERING SERVICES, INC., a North Carolina corporation.	Case No: 2:16-cv-0 STIPULATION CONTINUE JOIN DEADLINE DEA
17 18 19 20 21 22 23 24	IRVING A. BACKMAN, an individual; IRVING A. BACKMAN & ASSOCIATES, LLC, a Massachusetts limited liability company; and G&B ENERGY, INC., a Massachusetts corporation. Plaintiff, vs. CHRISTOPHER M. GOGGIN, an individual; and C2 ENGINEERING SERVICES, INC., a North Carolina corporation. Defendants.	Case No: 2:16-cv-0 STIPULATION CONTINUE JOIN DEADLINE DEA

Case No: 2:16-cv-01108-JCM-PAL

STIPULATION AND ORDER TO CONTINUE JOINT PRE-TRIAL ORDER **DEADLINE AND RELATED DEADLINES**

(First Request)

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Pursuant to LR 26-4 and LR 1A 6-1, plaintiffs Irving A. Backman, Irving A. Backman & Associates, LLC, and G&B Energy, Inc. ("Plaintiffs") and defendants Christopher M. Goggin and C2 Engineering Services, Inc. ("Defendants"), hereby stipulate as follows:

WHEREAS, pursuant to the Order Approving Stipulation to Continue Discovery Deadlines [Docket No. 85] and Minute Order [Docket No. 126], all discovery deadlines, as amended and extended, have now passed;

WHEREAS, on or around August 12, 2018, plaintiff Irving A. Backman, a 93-year old man residing in Dedham, Massachusetts, had a stroke;

WHEREAS, on September 11, 2018, the Court entered a Sealed Order granting in part and denying in part Plaintiffs' Motion for Summary Judgment and said order restarted the time for the filing of a Joint Pretrial Order;

WHEREAS, on September 25, 2018, Plaintiffs' counsel was first able to speak with Mr. Backman regarding the Sealed Order and the next steps in this case;

WHEREAS, the deadline for the Parties to file a Joint Pretrial Order is in less than twentyone days on October 11, 2018 and would have been less than twenty-one days prior to when Plaintiffs' counsel was first able to speak with Mr. Backman;

WHEREAS, the Parties agree that Mr. Backman should have some additional time to recover from his stroke and to return to good health;

WHEREAS, the Parties desire to continue with settlement negotiations in hopes of reaching a resolution and avoiding trial on the outstanding issues remaining following entry of this Court's Sealed Order on Plaintiffs' Motion for Summary Judgment;

WHEREAS, the Parties agree that a four-month continuance is in their best interest to conserve time and expenses, and to avoid unnecessary work in preparing for trial and therefore good cause exists to stay these proceedings for the reasons stated herein;

WHEREAS, the Parties desire a four-month continuance of the October 11, 2018 joint pre-trial order deadline, until Friday, February 8, 2019;

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WHEREAS, the Parties agree that neither Plaintiffs nor Defendants will be prejudiced by a temporary stay of proceedings;

WHEREAS, this is the Parties' first request to continue the joint pre-trial order deadline;

NOW, THEREFORE, the Parties, by and through their respective counsel, subject to the agreement of this Court, hereby stipulate to and respectfully request that the Court issue an order providing that:

- 1. The upcoming deadline to file a Joint Pretrial Order shall be continued for four months (from October 11, 2018 until **Friday, February 8, 2019**); and
 - 2. All other remaining deadlines be continued for four months.

DATED this 3rd day of October, 2018.

DATED this 3rd day of October, 2018.

McDONALD CARANO LLP

BLUT LAW GROUP, PC

By: /s/ Lisa Wiltshire Alstead
Craig A. Newby
Lisa Wiltshire Alstead
2300 West Sahara Avenue, Suite 1200
Las Vegas, NV 89102

Michael C. Fee Dennis M. Lindgren PIERCE & MANDELL, P.C. 11 Beacon Street, Suite 800 Boston, MA 02108 By: /s/ Elliot Blut
Elliot S. Blut
300 South Fourth Street, Suite 701
Las Vegas, Nevada 89101

Attorneys for Defendants Christopher M. Goggin and C2 Engineering Services, Inc.

Attorneys for Irving A. Backman, Irving A. Backman Associates, LLC and G&B Energy, Inc.

ORDER

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: October 31, 2018

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on the 3rd day of October, 2018, I served a true and correct copy of the: **JOINT STIPULATION TO**

CONTINUE JOINT PRE-TRIAL ORDER DEADLINE AND RELATED DEADLINES via

the United States District Court's CM/ECF system as follows:

Elliot S. Blut, Esq. Blut Law Group, PC 300 South Fourth Street, Suite 701 Las Vegas, Nevada 89101

Attorneys for Defendants Christopher M. Goggin and C2 Engineering Services, Inc.

> /s/ Angela Shoults An employee of McDonald Carano LLP

4814-3977-8933, v. 1